

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

CINDY RYU, individually and on behalf  
of all others similarly situated,

-----X  
**ANSWER**

Plaintiff(s),

-against-

**19-cv-01868-RJD-PK**

OPTION SOLUTIONS LLC d/b/a  
QUALIA COLLECTION SERVICES,

Defendant.

-----X  
Defendant, OPTION SOLUTIONS LLC d/b/a QUALIA COLLECTION SERVICES, by its  
attorneys, BARRON & NEWBURGER, P.C., answers plaintiff's Complaint as follows:

1. Defendant acknowledges being sued pursuant to the Fair Debt Collection Practices Act (“FDCPA”) but denies any violation thereof.
2. Defendant admits the allegations contained in paragraph “2” of the Complaint.
3. Defendant admits the allegations contained in paragraph “3” of the Complaint.
4. Defendant admits the allegations contained in paragraph “4” of the Complaint.
5. Defendant admits the allegations contained in paragraph “5” of the Complaint.
6. Defendant admits the allegations contained in paragraph “6” of the Complaint.
7. Defendant admits the allegations contained in paragraph “7” of the Complaint.
8. Defendant admits the allegations contained in paragraph “8” of the Complaint.
9. Defendant admits the allegations contained in paragraph “9” of the Complaint.
10. Defendant admits the allegations contained in paragraph “10” of the Complaint.
11. Defendant admits the allegations contained in paragraph “11” of the Complaint.

12. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph “12” of the Complaint.
13. Defendant admits the allegations contained in paragraph “13” of the Complaint.
14. Defendant admits the allegations contained in paragraph “14” of the Complaint.
15. Defendant admits the allegations contained in paragraph “15” of the Complaint.
16. Defendant admits the allegations contained in paragraph “16” of the Complaint.
17. Defendant repeats and realleges its previous admissions and denials contained in paragraphs “1” through “16” of the Complaint.
18. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.
19. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.
20. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.
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33. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

34. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

35. Defendant admits the allegations contained in paragraph “35” of the Complaint.

36. Defendant admits the allegations contained in paragraph “36” of the Complaint.

37. Defendant admits the allegations contained in paragraph “37” of the Complaint.
38. Defendant admits the allegations contained in paragraph “38” of the Complaint.
39. Defendant admits the allegations contained in paragraph “39” of the Complaint.
40. Defendant admits the allegations contained in paragraph “40” of the Complaint.
41. Defendant denies any obligation to disclose the fact that interest is no longer accruing on this account.
42. Defendant denies any obligation of duty to disclose that the amount stated in the collection letter will not increase due to additional fees.
43. Defendant denies each and every allegation contained in paragraph “43” of the Complaint.
44. Defendant denies each and every allegation contained in paragraph “44” of the Complaint.
45. Defendant admits the allegations contained in paragraph “45” of the Complaint.
46. Defendant denies each and every allegation contained in paragraph “46” of the Complaint.
47. Defendant denies each and every allegation contained in paragraph “47” of the Complaint.
48. Defendant denies each and every allegation contained in paragraph “48” of the Complaint.
49. Defendant denies each and every allegation contained in paragraph “49” of the Complaint.

50. Defendant repeats and realleges its previous admissions and denials contained in paragraphs “1” through “49” of the Complaint.

51. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

32. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

53. Defendant admits the allegations contained in paragraph “53” of the Complaint.

54. Defendant denies each and every allegation contained in paragraph “54” of the Complaint.

55. Defendant denies each and every allegation contained in paragraph “55” of the Complaint.

56. Defendant repeats and realleges its previous admissions and denials contained in paragraphs “1” through “55” of the Complaint.

57. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

58. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

59. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

60. Defendant denies making any representation that it is entitled to receive compensation for payment via a fee.

61. Defendant denies each and every allegation contained in paragraph “61” of the

Complaint.

62. Defendant denies each and every allegation contained in paragraph “62” of the Complaint.

63. Defendant denies each and every allegation contained in paragraph “63” of the Complaint.

64. Defendant repeats and realleges its previous admissions and denials contained in paragraphs “1” through “63” of the Complaint.

65. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

66. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

67. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

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76. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

77. This paragraph contains no factual allegations directed against the defendant and require no admissions or denials.

78. Defendant admits the allegations contained in paragraph “78” of the Complaint.

79. Defendant admits the allegations contained in paragraph “79” of the Complaint.

80. Defendant admits the allegations contained in paragraph “80” of the Complaint.

81. Defendant denies each and every allegation contained in paragraph “81” of the Complaint.

82. Defendant denies each and every allegation contained in paragraph “82” of the Complaint.

83. Defendant denies each and every allegation contained in paragraph “83” of the Complaint.

84. Defendant denies each and every allegation contained in paragraph “84” of the Complaint.

85. Defendant denies each and every allegation contained in paragraph “85” of the Complaint.

86. Defendant denies each and every allegation contained in paragraph “86” of the Complaint.

87. Defendant denies each and every allegation contained in paragraph “87” of the Complaint.

88. Defendant denies each and every allegation contained in paragraph “88” of the Complaint.

89. Defendant denies each and every allegation contained in paragraph “89” of the Complaint.

90. Defendant denies each and every allegation contained in paragraph “90” of the Complaint.

91. Defendant denies each and every allegation contained in paragraph “91” of the Complaint.

92. Defendant acknowledges plaintiff’s efforts to bring this matter as a class action but denies any violation of the FDCPA and denies that this matter is suitable for class certification.

93. Defendant acknowledges plaintiff’s efforts to bring this matter as a class action but denies any violation of the FDCPA and denies that this matter is suitable for class certification.

94. Defendant admits the allegations contained in paragraph “94” of the Complaint.

95. Defendant acknowledges plaintiff’s efforts to bring this matter as a class action but denies any violation of the FDCPA and denies that this matter is suitable for class certification.

96. Defendant acknowledges plaintiff’s efforts to bring this matter as a class action but

denies any violation of the FDCPA and denies that this matter is suitable for class certification.

97. Defendant acknowledges plaintiff's efforts to bring this matter as a class action but denies any violation of the FDCPA and denies that this matter is suitable for class certification.

98. Defendant acknowledges plaintiff's efforts to bring this matter as a class action but denies any violation of the FDCPA and denies that this matter is suitable for class certification.

WHEREFORE, defendant, OPTIO SOLUTIONS LLC d/b/a QUALIA COLLECTION SERVICES, respectfully requests that plaintiff's Complaint be dismissed.

Dated: New City, New York  
June 24, 2019

  
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